

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	1:04CR10146-WGY-001
)	
ROBERT A. RAMOS,)	
)	

THE CHILD SUPPORT ENFORCEMENT DIVISION
OF THE MASSACHUSETTS DEPARTMENT OF REVENUE'S
MOTION TO DECLARE FORFEITURE OF MONEY SEIZED FROM
DEFENDANT IN PAYMENT OF PAST-DUE CHILD SUPPORT

Pursuant to 42 U.S.C. § 651 et. seq. and M.G.L. c. 119A, § 6, the Child Support Enforcement Division of the Massachusetts Department of Revenue (DOR), an interested party/creditor, requests this court to forfeit the money the Federal Bureau of Investigation (FBI) seized from the defendant, Robert A. Ramos (hereinafter "Ramos"), in the amount of \$2,000 in payment toward past-due child support.

In support of this motion, DOR states:

1. In December, 2003, Ramos made a \$2,000 partial payment to a hired hitman for the intended murder-for-hire of his son's mother.
2. The FBI now holds this money in a special account.
3. On December 9, 2003, a criminal complaint was filed in the United States District Court for the District of Massachusetts against Ramos. Ramos was arrested the following day. He was charged with Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire; Aiding and Abetting; and Interstate Travel in Commission of Murder-for-Hire.
4. On January 11, 2005, Ramos entered a plea of guilty to Counts 1 through 3.
5. As of November 30, 2005, Ramos owes \$16,354.36 in past-due child support, including interest and penalties, to his son's mother. DOR is enforcing the child support obligation on behalf of the mother. DOR is therefore an interested party/creditor in this matter.

6. DOR seeks to have the funds in the amount of \$2,000 held by the FBI remitted to DOR. All remitted funds will be applied to Ramos's past-due child support and disbursed to Ramos's son's mother for the benefit of the minor child.

WHEREFORE, DOR requests this Court to forfeit the funds in the amount of \$2,000 held by the FBI for Ramos, pursuant to 42 U.S.C. § 651 et. seq. and M.G.L. c. 119A, § 6, to DOR to be applied to his past-due child support.

A proposed order is filed herewith for the Court's convenience.

Respectfully submitted,
Massachusetts Department of Revenue
Child Support Enforcement Division
By its attorney,

Dated: December 28, 2005

/s/ Tracey B. Harding
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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the Motion and Memorandum of Law was served by first-class mail to the defendant's attorney, Barry Wilson, located at 240 Commercial Street, Boston, MA 02109 and to Christopher R. Donato, Assistant U.S. Attorney, 1 Courthouse Way, Suite 9200, Boston, MA 02210.

/s/ Tracey B. Harding
Tracey B. Harding, Counsel

Dated: December 28, 2005